

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 12 (MC2009-28)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-38

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(October 31, 2012)

In Order No. 1440, issued August 17, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until October 30, 2012. The Postal Service expected to have a replacement contract ready to file earlier this week, and would have concurrently filed a motion to extend the existing contract until the Commission could complete its review of the new agreement. However, because of the closure of Postal Service Headquarters over the past two days as a result of severe weather, the Postal Service was unable to make any such filings prior to the October 30, 2012, expiration date.

Nevertheless, the Postal Service and the customer desire to continue their current contractual relationship until the new agreement has been approved by the Commission. The Postal Service expects to have a replacement contract signed and ready to file with the Commission within the next week. Yet because of the extraordinary circumstances of the past two days, and the timing of the postal regulatory process, the customer faces the prospect of an interruption in its access to negotiated rates during this interim period.

To avoid this result, the Postal Service respectfully requests that the Commission authorize an additional thirty-day extension, effective October 31, 2012, to allow the existing contract to remain in effect until such time as the Commission is able to complete its review of the new agreement. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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